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18
19 IN RE PLAID INC. PRIVACY
LITIGATION

20
21 THIS DOCUMENT RELATES TO:
ALL ACTIONS

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26 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

27 Master Docket No.: 4:20-cv-03056-DMR

28
**DECLARATION OF RACHEL GEMAN
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO MOTION TO
DISMISS**

Hon. Donna M. Ryu

Action Filed: May 4, 2020

Trial Date: None Set

1 I, Rachel Geman, declare and state as follows:

2 1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP, counsel for the Plaintiffs
3 and the proposed Classes in the above captioned litigation. I am a member in good standing of the State
4 Bar of New York. I am older than 21 years of age and am not a party to this action. I make this
5 declaration in support of Plaintiffs' Opposition to Defendant Plaid, Inc.'s Motion to Dismiss (Dkt. 78).
6 If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Complaint in *Toronto-*
8 *Dominion Bank v. Plaid Inc.*, No. 20-14424 (D.N.J.), filed October 14, 2020.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Assembly Committee on
10 Appropriations Bill Analysis regarding Senate Bill 355 (July 13, 2005).

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of Assembly Committee on
12 Judiciary Bill Analysis regarding Senate Bill 355 (June 28, 2005).

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of Senate Rules Committee Bill
14 Analysis regarding Senate Bill 355 (August 25, 2005).

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of Introduction of Senate Bill 355
16 by Senator Murray (February 16, 2005).

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of Assembly Committee on
18 Business and Professions Bill Analysis regarding Senate Bill 355 (June 21, 2005).

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of Senate Judiciary Committee
20 Bill Analysis regarding Senate Bill 355 (April 5, 2005).

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day
22 of November, 2020, at New York, New York.

23
24 _____
25 */s/ Rachel Geman*
26 Rachel Geman
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